#### REMARKS

Applicant respectfully requests reconsideration of this application, as amended, and consideration of the following remarks. Claims 1-4, 7-10, 12, 14, 18, 19 and 20 have been amended. Claims 5, 6, 11, 13, 15-17 were previously canceled. New claim 21 has been added. Claims 1-4, 7-10, 12, 14 and 18-21 remain pending.

Claims 1-4, 7-10, 12, 14 and 18-20 stand objected to for using the term "crypto" instead of the term "cryptographic". While the inventor has the right to use and define his own terms, Applicant has amended claims 1-4, 7-10, 12, 14 and 18-20 to replace the term "crypto" with the term "cryptographic" to avoid any misunderstandings of the claims. These amendments did not change the scope of the claims and did not introduce new matter. Further, these amendments were not made in regard to the cited references but merely to remove a possibly unclear term objected to by the Examiner.

Claims 2 and 3 stand objected to for using the term "muxes" instead of the term "multiplexers". While the inventor has the right to use and define his own terms, Applicant has amended claims 2 and 3 to replace the term "muxes" with the term "multiplexers" to avoid any misunderstandings of the claims. These amendments did not change the scope of the claims and did not introduce new matter. Further, these amendments were not made in regard to the cited references but merely to remove a possibly unclear term objected to by the Examiner.

Claims 1-4, 7-10, 12 and 14 and 18-20 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Zakiya (U.S. Pat. Pub. 2002/0032551) in view of Qi (U.S. Pat. Pub. 2002/0184498).

#### Amendments

#### Amendments to the Claims

Applicant has amended the claims to more particularly point out what Applicant regards as the invention. No new matter has been added as a result of these amendments as they were supported elsewhere in the specification, claims and drawines as originally filed.

## Rejections

## Rejections under 35 U.S.C. §103(a)

Claims 1-4, 7-10, 12 and 14 and 18-20 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Zakiya (U.S. Pat. Pub. 2002/0032551) in view of Qi (U.S. Pat. Pub. 2002/0184498). Applicant respectfully traverses these rejections as set forth in more detail below.

The Zakiya reference discloses methods and systems to perform hash algorithms as logic gate functions. It processes an N-bit block of data into the M-bit hash or message digest of the block in one (1) process cycle instead of the multiple cycles generally required. The minimum process time is the total propagation delay of an input block through the core logic for an implementing technology. A message requiring Y blocks to process would require no more than Y process (clock) cycles to produce the final hash value. This creates very simple and fast implementations of hash algorithms which enable them to be simply and easily integrated into any system.

The Qi reference discloses an architecture (hardware implementation) for an authentication engine to increase the speed at which SHA1 multi-loop and/or multi-round authentication algorithms may be performed on data packets transmitted over a computer network. As described in this application, the invention has particular application to the variant of the SHA1 authentication algorithms specified by the IPSec cryptography standard. In accordance with the IPSec standard, the invention may be used in conjunction with data encryption/encryption architecture and protocols. However it is also suitable for use in conjunction with other non-IPSec cryptography algorithms, and for applications in which encryption/decryption is not conducted (in IPSec or not) and where it is purely authentication that is accelerated. Among other advantages, an authentication engine in accordance with the present invention provides improved performance with regard to the processing of short data packets.

Applicant submits that neither Zakiya nor Qi teach or even suggest a 4 to 2 compressor in a hash logic circuit.

Zakiya's carry look-ahead adders (for example, instead of 340 and 341 in Figure 3 or instead of 540 and 541 in Figure 5 or instead 740 and 742 in Figure 7) which are much longer propagation delay and consume much more area of the die than a 4 to 2 compressor.

Qi uses two, sequential 3 to 2 compressors (usually called full adders, or FA as shown in Qi's Figures 6A, 7, 9A, 9B, and 10) instead of using Applicant's 4 to 2 compressors.

Qi's two, sequential 3 to 2 compressors consumes the approximately the same area as the Applicant's 4 to 2 compressors, however, Qi's two, sequential 3 to 2 compressors have a 33% longer propagation delay.

The Examiner states that Qi's Figure 9B shows a 4 to 2 compressor. However, this is not a 4 to 2 compressor and even Qi does not call it that. Qi's paragraph [0059] provides as follows:

"[0059] Two comprehensive addition modules, add5to1 and add4to1, in the architecture each use several stages of CSA followed-by a carry look-ahead (CLA) adder, as illustrated and described in more detail with reference to FIG. 10, below FIGS. 9A and 9Bs, Illustrate block diagrams of the add5to1 and add4to1 comprehensive addition module; respectively. The add5to1 module includes three CSA adders followed by a CLA. The add4to1 module includes two CSA adders followed by a CLA." (Emphasis added)

Qi clearly refers to this module as a "comprehensive addition module". Qi further describes the comprehensive addition module as "The add 4 to 1 module includes two CSA adders followed by a CLA."

Applicant submits that two CSA adders (full adders) in sequence is **not** the same thing as a 4 to 2 compressor. Each CSA (full adder, see Qi's Fig. 6A) has the minimum propagation delay latency of two XOR gates and so two CSAs in sequence have the minimum propagation delay latency of **four XOR gates**.

Applicant's 4 to 2 compressor is NOT just "any circuit unit that receives multiple inputs and compresses them into fewer outputs". By way of example,

Applicant's 4 to 2 compressor has the *constant* propagation delay latency of *only* three XOR gates as compared to the propagation delay latency of Qi's circuit.

Applicant's 4 to 2 compressor also has a vector length *independent* propagation latency where the structures of both Qi and Zakiya are have vector length *dependent* propagation latencies,

The propagation latency of Applicant's 4 to 2 compressor from the inputs to the outputs of a compressor is independent of length of the vectors. It does not matter how many terms are in the vector (the range of the variable i), the execution time of Applicant's 4 to 2 compressor is constant.

In sharp contrast, Qi's Figure 8 shows a carry look-ahead adder. The carry value must propagate the entire length of the carry look-ahead adder circuit from C0 to Ci+1 in the Carry look-ahead Logic.

Therefore, as the size of the vectors increase (i.e., as the value of i increases), not only does the width of the Carry Look-ahead Logic increase, but the depth (the vertical height) of the Carry Look-ahead Logic also increases and as a result, the propagation delay also increases with the log of the vector size.

Therefore, Qi's Carry Look-ahead Logic does not have a *constant* propagation latency that is independent of the size of the vector, where Applicant's 4 to 2 compressor does have a constant propagation latency of 3 XOR gate delays that is entirely independent of the size of the vector.

While Qi does use full adders Qi does not teach or suggest using 4 to 2 compressors as Applicant does (i.e., having Applicant's smaller size and reduced, constant propagation latency). Further, Qi does not teach or suggest a circuit that is capable of executing multiple hash algorithms.

Turning to Zakiya, Zakiya does not show any compressors in any of Zakiya's figures since two inputs summed to one output necessarily involves carries

propagating the carry along the length of the vector which cannot be done in constant (vector length independent) latency propagation delay.

Thus, much as described above with regard to Qi's structure, Applicant submits that Zakiya's carry look-ahead adder is not the same as nor even suggestive of Applicant's 4 to 2 compressor.

Further, Zakiya does not use any compressors. As a practical mater, this makes Zakiya's circuits much larger in area and slower, vector length dependant, propagation delay than Applicant's system with a constant vector length independant, propagation delay.

The combination of Qi and Zakiya will not resolve the failings of the teachings of the references when considered alone. For example, referring to Qi's Figure 9B and substituting that structure in for modules 340, 341, and 342 in Zakiya's Figure 3 would result in 342 in Zakiya's Figure 3 being the same as the CLA in Qi's Figure 9B. This may be a substantial improvement over either Qi or Zakiya separately, but still not as good as using Applicant's further reduced propagation latency that is also a vector length independent propagation latency and also provides a smaller area consumption afforded by Applicant's 4 to 2 compressor.

It would not be obvious to add a vector length independent propagation latency structure to either Qi or Zakiya or a combination thereof because both Qi and Zakiya utilize the vector length *dependent* propagation latency structures and this impacts the design and timing of the entire structure.

As to claims 1-4, 7-10, 12, 14 and 18-20, none of the cited references whether considered alone or in combination teach or suggest a system method or apparatus where the hash modules share logic components (e.g., adders, compressors, etc.) that are selectable and used to perform the respective, selected hash functions.

With regard to new claim 21 and amended claims 14 and 19, neither of Qi or Zakiya or any combination thereof nor any of the previously cited references whether considered alone or in any combination teach or suggest a cryptographic algorithm unit including a first-cryptographic hash execution module that is capable of executing at least one of a group of cryptographic hash algorithms consisting of a SHA256 hash algorithm, a SHA384 hash algorithm, and a SHA512 hash algorithm and a second cryptographic hash execution module is capable of executing at least one of a group of cryptographic hash algorithms consisting of the SHA-1 hash algorithm, a SHA256 hash algorithm, a SHA384 hash algorithm, and a SHA512 hash algorithm that is different from the cryptographic hash algorithm that the first cryptographic hash execution module is capable of executing.

Accordingly, Applicant respectfully submits that Applicant's invention as claimed in claims 1-4, 7-10, 12, 14 and 18-21 is patentably distinct over any of the cited references whether considered alone or in any combination, and respectfully request the withdrawal of the rejections under 35 U.S.C. §103(a).

# SUMMARY

In view of the foregoing amendments and remarks, Applicant respectfully submits that the pending claims are in condition for allowance. Applicant respectfully requests reconsideration of the application and allowance of the pending claims.

If the Examiner determines the prompt allowance of these claims could be facilitated by a telephone conference, the Examiner is invited to contact George B. Leavell at (408)774-6923.

### Deposit Account Authorization

Authorization is hereby given to charge our Deposit Account No. 50-0805 (Ref SUNMP349) for any charges that may be due or credit our account for any overpayment. Furthermore, if an extension is required, then Applicant hereby requests such extension.

Respectfully submitted,

MARTINE PENILLA & GENCARELLA, LLP

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/George B, Leavell/
George B, Leavell/
Attorney for Applicant
Registration No. 45,436
710 Lakeway Drive, Suite 200
Sunnyvale, CA 94085
(408) 774-6923